

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

DEFINITION SERVICES INC.,	)	
a British Virgin Islands corporation,	)	
	)	
Plaintiff,	)	
	)	C.A. No. 21-cv-00741-MN-JLH
v.	)	
	)	
GVA CAPITAL LTD., a Cayman Islands	)	
exempted company,	)	
	)	
Defendant.	)	

**THIRD JOINT STIPULATION AND ~~PROPOSED~~ ORDER  
STAYING PROCEEDINGS FOR SIX MONTHS**

WHEREAS, on October 27, 2022, the Court entered a scheduling order in this matter (D.I. 85);

WHEREAS, on February 7, 2023, Plaintiff Definition Services Inc. (“Definition”) moved for a temporary stay of these proceedings (D.I. 90-92, 94) (the “Motion to Stay”), which motion was opposed by Defendant GVA Capital Ltd. (“GVA”) (D.I. 93);

WHEREAS, on March 28, 2023, the parties stipulated to a stay of these proceedings for 30 days, which the Court so-ordered on March 28, 2023 (D.I. 104-05) (the “First Stipulated Stay”);

WHEREAS, during the First Stipulated Stay, GVA applied for a license from the Office of Foreign Assets Control (“OFAC”) to engage in settlement negotiations with Definition regarding the assets at the center of the dispute in this case, which assets are currently blocked by OFAC;

WHEREAS, following the expiration of the First Stay, on May 2, 2023, the Court denied Definition’s Motion to Stay (D.I. 109);

WHEREAS, on May 26, 2023, the parties stipulated to a proposed amended scheduling order, which was so-ordered by the Court on May 30, 2023 (D.I. 124) (the “Amended Scheduling

Order”);

WHEREAS, following entry of the Amended Scheduling Order, on July 11, 2023, GVA and Definition stipulated to a second stay of these proceedings for a period of six (6) months, and adjourning all pretrial deadlines in order for the parties to address OFAC-related issues related to these proceedings, which stipulation the Court so-ordered on July 12, 2023 (the “Second Stipulated Stay”);

WHEREAS, OFAC has not yet issued a license to negotiate a settlement and the assets at issue in this matter remain blocked by OFAC indefinitely with no indication as to when, or if, they will be released;

WHEREAS, until the assets are released, the disposition of the case will not provide complete relief to either party;

WHEREAS, it is GVA’s position that GVA should obtain a license from OFAC to pursue settlement negotiations;

WHEREAS, Definition does not object to GVA’s position regarding the need for a license from OFAC to pursue settlement negotiations;

WHEREAS, the parties have agreed to request from OFAC authorization to mediate this dispute with the hopes of resolving the matter and removing it from the Court’s docket;

IT IS HEREBY STIPULATED AND AGREED by the undersigned counsel for Definition and GVA, subject to the approval of the Court, that:

- (1) This matter is temporarily stayed for an additional period of six (6) months from the date this stipulation is so-ordered by the Court (the “Third Stipulated Stay”);
- (2) All pre-trial deadlines in the Amended Scheduling Order, as well as the trial date, continue to be adjourned; and

(3) Thirty (30) days prior to the expiration of this Third Stipulated Stay, the parties shall jointly file an update to the Court including a proposed pre-trial schedule.

Dated: December 8, 2023

**PASHMAN STEIN WALDER HAYDEN,  
P.C.**

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*Attorneys for Defendant  
GVA Capital Ltd.*

IT IS SO ORDERED this 14th day of December 2023

  
HONORABLE JENNIFER L. HALL  
UNITED STATES MAGISTRATE JUDGE